

FRESHFIELDS BRUCKHAUS DERINGER US LLP

Timothy P. Harkness
David Y. Livshiz
601 Lexington Avenue, 31st Floor
New York, NY 10022
212-277-4000 (Telephone)
212-277-4001 (Facsimile)

Attorneys for Shield Securities Limited

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
	:
In re:	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i> ,	: Case No. 08-13555 (SCC)
	:
Debtors.	:
	:
-----	X
	:
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:
	:
Plaintiff,	:
-against-	: Adversary Proceeding
	: No. 10-03547 (SCC)
BANK OF AMERICA NATIONAL ASSOCIATION,	:
<i>et al.</i> ,	:
Defendants.	:
-----	X

CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed. R. Civ P. 7.1, made applicable hereto by Fed. R. Bankr. P. 7007.1, and so as to enable the Bankruptcy Judge to evaluate possible disqualification or recusal, the undersigned counsel for Shield Securities Limited (a private non-governmental party) certifies that Shield Securities Limited is a wholly owned direct subsidiary of Shield Holdings (Guernsey) Limited, whose ultimate parent is Paris Orleans SCA, an entity listed on NYSE Euronext Compartiment A (France) in Paris, France.

Dated: New York, New York
April 17, 2014

FRESHFIELDS BRUCKHAUS
DERINGER US LLP

By: s/ David Y. Livshiz

Timothy P. Harkness
David Y. Livshiz
601 Lexington Avenue
New York, New York 10022
212-277-4000 (Telephone)
212-277-4001 (Facsimile)
timothy.harkness@freshfields.com
david.livshiz@freshfields.com

Attorneys for Shield Securities Limited